

# PUBLIC SUBMISSION

<b>As of:</b> November 10, 2010
<b>Received:</b> November 08, 2010
<b>Status:</b> Posted
<b>Posted:</b> November 10, 2010
<b>Tracking No.</b> 80b84bc6
<b>Comments Due:</b> November 08, 2010
<b>Submission Type:</b> Web

**Docket:** EPA-R03-OW-2010-0736

Draft Chesapeake Bay Total Maximum Daily Load

**Comment On:** EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

**Document:** EPA-R03-OW-2010-0736-0494

Anonymous public comment

---

## Submitter Information

---

### General Comment

In hearing about and reading the Virginia plan for addressing the long-delayed cleanup of the Chesapeake Bay, I note that many small and medium-sized sources of pollution were addressed in the EPA/Virginia hearing in Richmond on October 6, 2010, and in writing, but that one of our major pollution sources was completely overlooked. Coal-fired power plants contribute enormous amounts of diverse contaminants to the Bay through at least three vectors:

1 deposition of particles and chemicals carried by air, such as nitrogen oxides, sulfur compounds and mercury;  
2 chronic effluents from coal combustion waste storage sites such as impoundment ponds, dry storage, and the recycled ash used in road-building, construction, golf courses etc.

3 The risks, proven real and severe, of catastrophic coal combustion waste escapes, which were displayed for all of us in the Christmas 2008 disaster at TVA's Kingston plant.

Even the most ardent climate science denier can hardly deny these large and long-lasting sources of both standard TMDL chemicals like nitrogen in the Chesapeake Bay and its watershed, and the numerous coal combustion by-product chemicals with more serious toxic effects on the Bay ecology.

While the science is newer and much less settled, analysis of detrimental inputs to the Bay should not overlook the effects of ultra-fine particles, which apparently cause even more serious damage, as evidenced by their apparent ability to pass through the human blood-brain barrier and damage the very well-protected brain chemistry, as well as, presumably, other Bay life forms that have not yet been investigated.

In a technological coincidence, our coal-fired power plants need enormous amounts of water for cooling, so they are almost all located on rivers or other large bodies of water. In Virginia, most of these flow directly or indirectly into the Bay.

It seems impossible to present a serious plan for clean-up of the Chesapeake Bay without considering coal power plants